

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

PAULSON PRV HOLDING LLC et al.

CASE NO. 23-cv-01521 SCC

Plaintiff

CIVIL RICO

FAHAD GHAFFAR et al.

Defendants

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**Defendant Amir Ghaffar's Request for a brief extension of time**

TO THE HONORABLE COURT:

COMES NOW, co-defendants Amir Ghaffar, Coverisq LLC and Tygate PTE Ltd., through undersigned counsel and most respectfully state and pray as follows:

1. Pursuant to this court's order of 11-29-2023, *docket 46*, plaintiffs were ordered to file a RICO Case Statement on or before December 19, 2023, although they requested, *docket 51*, and the Court granted *nunc pro tunc*, a three-day extension, *docket 53*. Plaintiffs filed their RICO Case Statement on 12-21-2023, *docket 52*. As per the court's November 2023 order, all defendants must file their responsive pleadings by tomorrow, January 18, 2024.

2. Now defendants Amir Ghaffar, Coverisq LLC and Tygate PTE Ltd. need to request a brief three-day extension of time because their lead counsel, undersigned attorney Bámily López Ortiz, is at present ill and under medical treatment. Appearing defendants request that they be allowed to file their responsive pleading by Tuesday, January 23, 2024.

3. The extension requested is sought in good faith and will not cause undue delay in the consideration of this case.

**WHEREFORE**, Amir Ghaffar, Coverisq LLC and Tygate PTE Ltd. request a three-day extension of time – until January 23, 2024 - to file their responsive pleading in compliance with this court's 11-29-2023 order, *docket 46*.

**I HEREBY CERTIFY** that this document has been tendered for filing by electronic means and pursuant to FRCP 5(b)(2)(E) and 5(b)(3) and Puerto Rico Local Rule 5(b)(2), receipt of the Notice of Electronic Filing generated by the Court's Electronic Case Filing System constitutes the equivalent of service of the instant motion to all pertinent persons.

Dated: January 17, 2024.

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*s/Bámy López Ortiz*  
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